

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS	:	
ANTITRUST LITIGATION	:	Master File No. 12-md-02311
	:	
This Document Relates to:	:	Hon. Marianne O. Battani
	:	
ALL DEALERSHIP ACTIONS	:	

**AUTO DEALERS' MOTION FOR AN EXTENSION
OF THE ROUND FOUR CLAIM-FILING DEADLINE**

Co-Lead Class Counsel for the Auto Dealers move the Court for an extension of the April 17, 2020 deadline to file claims in the Round Four settlements. This motion is brought to allow new car dealerships extra time to complete their claim filings, which may have been impeded by the COVID-19 public health emergency.

Dated: April 15, 2020

By: /s/ Gerard V. Mantese

Gerard V. Mantese (P34424)

MANTESE HONIGMAN, P.C.

1361 E. Big Beaver Road

Troy, MI 48083

Telephone: (248) 457-9200 Ext. 203

Facsimile: (248) 457-9201

gmantese@manteselaw.com

Interim Liaison Counsel for the Automobile Dealer Plaintiffs

Jonathan W. Cuneo
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Ave., NW
Suite 200
Washington, DC 20016
Telephone: (202) 789-3960
Facsimile: (202) 789-1813
jorc@cuneolaw.com

Don Barrett
BARRETT LAW GROUP, P.A.
P.O. Box 927
404 Court Square
Lexington, MS 39095
Telephone: (662) 834-2488
Facsimile: (662) 834-2628
dbarrett@barrettlawgroup.com

Shawn M. Raiter
LARSON KING, LLP
2800 Wells Fargo Place
30 East Seventh Street
St. Paul, MN 55101
Telephone: (651) 312-6500
Facsimile: (651) 312-6618
sraiter@larsonking.com

Interim Co-Lead Counsel for the Automobile Dealer Plaintiffs

CERTIFICATE OF SERVICE

I, GERARD V. MANTESE, HEREBY CERTIFY THAT I CAUSED A TRUE AND CORRECT COPY OF **AUTO DEALERS' MOTION FOR AN EXTENSION OF THE ROUND FOUR CLAIMS-FILING DEADLINE** TO BE SERVED VIA E-MAIL UPON ALL REGISTERED COUNSEL OF RECORD VIA THE COURT'S CM/ECF SYSTEM ON **April 15, 2020**.

/s/ Gerard V. Mantese
GERARD V. MANTESE

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS	:	
ANTITRUST LITIGATION	:	Master File No. 12-md-02311
	:	
This Document Relates to:	:	Hon. Marianne O. Battani
	:	
ALL DEALERSHIP ACTIONS	:	

**MEMORANDUM IN SUPPORT OF AUTO DEALERS' MOTION
FOR AN EXTENSION
OF THE ROUND FOUR CLAIM-FILING DEADLINE**

Co-Lead Class Counsel for the Auto Dealers believe that an extension of the April 17, 2020 deadline to file claims in the Round Four settlements is appropriate considering the COVID-19 public health emergency. Toward the end of the existing claim-filing period, the COVID-19 pandemic became widespread in the United States. The resulting business and community restrictions may have impacted the ability of some dealerships to file claims and will likely continue to affect claim filing for the near future.

Co-Lead Counsel for the Auto Dealers have consulted with the claims administrator, who confirmed that some potential settlement class members have inquired about an extension of the Round Four claim deadline. Representatives of other dealerships have directly contacted Co-Lead Counsel to report difficulties in perfecting claims because of stay-at-home and similar orders issued by most states. Co-Lead Class Counsel for the Auto Dealers therefore believe that the Round Four deadline to file claims should be extended to June 12, 2020.

Dated: April 15, 2020

By: /s/ Gerard V. Mantese

Gerard V. Mantese (P34424)

MANTESE HONIGMAN, P.C.

1361 E. Big Beaver Road

Troy, MI 48083

Telephone: (248) 457-9200 Ext. 203

Facsimile: (248) 457-9201

gmantese@manteselaw.com

Interim Liaison Counsel for the Automobile Dealer Plaintiffs

Jonathan W. Cuneo

CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Ave., NW

Suite 200

Washington, DC 20016

Telephone: (202) 789-3960

Facsimile: (202) 789-1813

jorc@cuneolaw.com

Don Barrett

BARRETT LAW GROUP, P.A.

P.O. Box 927

404 Court Square

Lexington, MS 39095

Telephone: (662) 834-2488

Facsimile: (662) 834-2628

dbarrett@barrettlawgroup.com

Shawn M. Raiter

LARSON KING, LLP

2800 Wells Fargo Place

30 East Seventh Street

St. Paul, MN 55101

Telephone: (651) 312-6500

Facsimile: (651) 312-6618

sraiter@larsonking.com

Interim Co-Lead Counsel for the Automobile Dealer Plaintiffs

CERTIFICATE OF SERVICE

I, GERARD V. MANTESE, HEREBY CERTIFY THAT I CAUSED A TRUE AND CORRECT COPY OF **MEMORANDUM IN SUPPORT OF AUTO DEALERS' MOTION FOR AN EXTENSION OF THE ROUND FOUR CLAIMS-FILING DEADLINE** TO BE SERVED VIA E-MAIL UPON ALL REGISTERED COUNSEL OF RECORD VIA THE COURT'S CM/ECF SYSTEM ON **April 15, 2020**.

/s/ Gerard V. Mantese
GERARD V. MANTESE